



February 13, 2025

Hon. Peggy Kuo  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201  
VIA ECF ONLY

Re: *Shkolir, et. al v. RX2GO, Inc., et. al.*; 1:23-cv-7256-OEM-PK (EDNY)  
SECOND MOTION TO EXTEND TIME TO FILE MOTION TO AMEND COMPLAINT

Your Honor:


I represent the Plaintiffs in the above-referenced action. Pursuant to Your Honor's Minute Entry and Order of January 22, 2025, the deadline for Plaintiffs to file their Motion to Amend their Second Amended Complaint is February 14, 2025, with any opposition by Defendants to be due by February 21, 2025. Plaintiffs respectfully request an extension of 2 weeks, to February 28, 2025, and March 14, 2025, respectively.

The reason for this request is that the parties have been continuing negotiations and have exchanged several offers back and forth. At the moment, Defendants' counsel is waiting to hear from his clients for next steps. The parties are hopeful with these negotiations. Opposing counsel consents to this request.

Pursuant to the Court's individual practice standards, the following is offered:

- a. The original date to file Third Amended Complaint: January 24, 2025; and Defendants' response by January 31, 2025.
- b. The reason for the request: See above.
- c. The number of previous requests for adjournment or enlargement: One.

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d. Whether these previous requests were granted or denied: Granted

e. Whether the adversary consents, and, if not, the reasons given by the adversary for refusing to consent: Opposing counsel consents to this request.

This request is not anticipated to impact or affect any other immediate deadlines in this case. Our current discovery deadline is March 31, 2025. The parties are likely to move the Court for that deadline to be extended for good cause later on if our settlement efforts are not successful, but that would likely be the case even without this request.

Thank you for your consideration.

Sincerely,



Penn Dodson, Esq.

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